

# **EXHIBIT 18**

Document title: Understanding Google Play's Payments policy - Play Console Help

Capture URL: <https://support.google.com/googleplay/android-developer/answer/10281818?hl=en#zippy=%2Ccan-i-distribute-my-app-on-other-android-app-stores-or-my-website%2Cmany-businesses-have-needed-to-move-their-physical-services-online-such-as-the-streaming-of-live-events-will-these-apps-need-to-use-google-plays-billing-system%2Cdo-googles-apps-have-to-follow-this-policy-too%2Ccan-i-communicate-with-my-users-about-alternative-ways-to-pay%2Ccan-i-communicate-with-my-users-about-promotions-on-other-platforms%2Ccan-i-have-different-app-features-prices-and-experience-depending-on-the-platform%2Ccan-i-offer-a-consumption-only-reader-app-on-google-play%2Cdoes-your-billing-policy-change-depending-on-my-app-category%2Ccan-i-offer-my-customers-refunds-directly%2Cwill-google-play-allow-cloud-gaming-apps%2Cshould-...>

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**Exhibit**  
**2640**

## Understanding Google Play's Payments policy



**Free training.**

Learn more about Google Play's Payments policy on the [Academy for App Success](#) .

Google Play's billing system is required for developers offering in-app purchases of digital goods and services distributed on Google Play.

It enables you to easily transact with millions of users around the world and gives users safe ways to pay and the ability to manage their payments from a central location. Play's billing system plays a critical role in helping us maintain user trust and keep Google Play safe.

### About Google Play's billing system

Google Play's billing system is a service that enables you to sell digital products and content in your Android app. You can use Google Play's billing system to sell a one-time product or subscriptions on a recurring basis. Visit the [Android Developers site](#) to learn how to integrate Google Play's billing system into your app.

Unless otherwise permitted by the [Payments policy](#), purchases that require use of Google Play's billing system include:

- Digital items (such as virtual currencies, extra lives, additional playtime, add-on items, characters, or avatars);
- Subscription services (such as fitness, game, dating, education, music, video, or other content subscription services);
- App functionality or content (such as an ad-free version of an app or new features not available in the free version); and
- Cloud software and services (such as data storage services, business productivity software, or financial management software).

Purchases that are not supported by Google Play's billing system include:

- Purchases or rentals of physical goods (such as groceries, clothing, houseware, or electronics);
- Purchases of physical services (such as transportation services, airfare, gym memberships, or food delivery); and
- Payment of a credit card or utility bill.

Google Play's billing system must not be used for peer-to-peer payments, content that facilitates online gambling, or any product category deemed unacceptable under [Google's Payments Center Content Policies](#) .

### Payments policy clarification

In 2020, we clarified the language in our [Payments policy](#) to be more explicit that all developers selling digital goods and services in their apps are required to use Google Play's billing system. Apps using an alternative in-app billing system will need to remove it in order to comply with the Payments policy.

We always strive to work with our developer community to help keep their apps on Play while they make any needed changes. While most developers have already complied with this long-standing policy, we gave a one year grace period for any that needed to make changes to their apps. Based on developer feedback, we gave eligible developers the option to request an [additional six months](#) , giving them a total of 18 months to bring their apps into compliance. We continue to work with developer partners to meet the evolving needs of our ecosystem.

Developers that are not compliant with the Payments policy will not be able to submit app updates until they bring their app into compliance unless an update is needed to fix a critical security issue. Starting June 1, 2022, any app that is still not compliant will be removed from Google Play.

Developers in India have until October 31, 2022 to comply due to unique circumstances with the payments landscape in the country. Please [visit our FAQ](#) for more details.

Developers with users in South Korea now have the option to integrate an alternative in-app billing system. Please [visit our FAQ](#) for more details.

### Frequently asked questions

Can I distribute my app on other Android app stores or my website?

Yes, you can distribute your app however you like. As an open ecosystem, most Android devices come preinstalled with more than one store – and users can install others. Android gives developers the freedom and flexibility to distribute their apps on other Android app stores, directly from a website, or through device preloads, all without using Google Play's billing system.

Many businesses have needed to move their physical services online, such as the streaming of live events. Will these apps need to use Google Play's billing system?

We recognize that the global pandemic has resulted in many businesses having to navigate the challenges of moving their physical business to digital and engaging customers in a new way, for example, moving in-person experiences and classes online. For that reason, these businesses will not be required to use Google Play's billing system for the next nine months, and we will continue to assess the situation over the next year.

Do Google's apps have to follow this policy too?

Yes. Google Play's developer policies — including the requirement that apps use Google Play's billing system for in-app purchases of digital goods — apply to all apps on Google Play, including Google's own apps.

Can I communicate with my users about alternative ways to pay?

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Use of SMS or Call Log permission groups

Requesting access to location in the background

Requirements for coronavirus disease 2019 (COVID-19) apps

Understand upcoming changes to news and news-related apps

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Preview: Use of the broad package (App) visibility (QUERY\_ALL\_PACKAGES) permission

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system for in-app purchases of digital goods — apply to all apps on Google Play, including Google's own apps.

Can I communicate with my users about alternative ways to pay?

Yes. Outside of your app you are free to communicate with your users about alternative purchase options. You can use email marketing and other channels outside of the app to provide subscription offers and even special pricing.

Within an app, developers may not lead users to a payment method other than Google Play's billing system unless permitted by the [Payments policy](#). This includes directly linking to a webpage that could lead to an alternate payment method or using language that encourages a user to purchase the digital item outside of the app.

Developers can refer users to administrative information — like an account management page, privacy policy, or to a help center — as long as the webpage does not eventually lead to an alternate payment method prohibited by the [Payments policy](#).

For services and products that are consumption only (apps that do not enable users to purchase access to digital goods or services from within the app), developers may choose to provide additional information about purchasing options without direct links, including using language like:

- "You can purchase this book directly on our website"
- "Go to our website to upgrade your subscription to Premium"
- "This movie isn't available to rent in the app. However, any movie you rent through ourwebsite.com will be immediately available to view in the app"
- "Need extra lives? Head to our website to purchase more"

Can I communicate with my users about promotions on other platforms?

Yes, you can email them or otherwise communicate outside your app about your offerings, even if they are different on Google Play.

Can I have different app features, prices, and experience depending on the platform?

Yes. We do not require parity across platforms. You can create different versions of your app to support different platforms, features, and pricing models.

Can I offer a consumption-only (reader) app on Google Play?

Yes. Google Play allows any app to be consumption-only, even if it is part of a paid service. For example, a user could login when the app opens and access content paid for somewhere else.

Does your billing policy change depending on my app category?

No. All app categories are subject to Google Play's [Payments policy](#).

Can I offer my customers refunds directly?

Yes. You can continue to issue refunds to your customers and offer customer support directly.

Will Google Play allow cloud gaming apps?

Yes. Cloud game streaming apps that comply with Google Play's policies are welcome on Google Play.

Should apps that provide goods or services like insurance, stock trades, investment consulting, or tax preparation and filing assistance use Google Play's billing system?

No. Purchases for goods or services like insurance, stock trades, investment consulting, or tax preparation and filing should not use Google Play's billing system.

My app provides clinical services. Should I use Google Play's billing system for those transactions?

Transactions involving regulated clinical services should not use Google Play's billing system. Regulated clinical services include services provided by or on behalf of a licensed healthcare provider that are intended to diagnose or manage (prevent, treat, mitigate or cure) medical conditions. These services may include consulting with a doctor, receiving a medical prescription, or treatment planning by a licensed healthcare professional.

In addition, digital COVID passport certification apps are not required to use Google Play's billing system if the service is provided by, and any associated fees are directly assessed by, a government agency.

Does the requirement to use Google Play's billing system apply to purchases of goods or services that can't be used within the app?

Purchases of digital goods or services that can only be consumed outside of a Play-distributed app and cannot be accessed in a Play-distributed app do not require Google Play's billing system. Examples include ringtones usable on the device but not in the app; web-only content never consumed in the app; and apps that manage cloud service platforms, but don't provide access to that cloud storage in-app.

Do I need to use Google Play's billing system to sell gift cards in my app?

No. Google Play's billing system is not required for the sale of in-app gift cards, regardless of whether the gift card is an eGift or physically mailed to the user.

Can I issue loyalty or reward points in my app without using Google Play's billing system?

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## Can I issue loyalty or reward points in my app without using Google Play's billing system?

Yes. Earned or awarded points can be issued in-app without using Google Play's billing system. Users can also exchange those earned or rewarded points in-app for digital goods and services without Google Play's billing system. However, keep in mind that if these points (or other types of virtual currency) are sold in-app, Google Play's billing system must be used.

## I'm a telecommunication or cable service provider. How does this policy affect my apps?

If you're a telecommunication, broadband, multichannel satellite, cable or managed IPTV (referred to as a "Physical Service") service provider, you may be eligible to combine certain digital goods or services, which are also available through your non-mobile sales channels, with your customer's existing physical service bill. The customer's physical service bill must be used as the form of payment and those digital goods or services can only be sold in your apps where users can manage their physical service or where in-app purchases are only available to your physical service subscribers. Examples include:

- Offering standard digital or physical service subscription bundles that are broadly available in non-mobile sales channels and billed to the users physical service bill.
- Offering transactional video on demand, music, digital comics, or digital books behind a paying digital service subscription that is billed to the users physical service bill.
- Offering video on demand to users subscribed to a physical multichannel satellite, cable, or managed IPTV service.

## What is the impact of recent South Korean legislation on Google Play's Payments policy? Will I still be charged a fee if I no longer use Google Play's billing system?

As a result of recent legislation, we will offer all developers the ability to offer an alternative in-app billing system alongside Google Play's billing system for South Korean users making in-app purchases within Play-distributed apps on mobile phones and tablets.

Developers will still be subject to a service fee for transactions using an alternative in-app billing system, but the service fee will be reduced by 4%. For example, when the service fee is 15% for transactions through Google Play's billing system, it will be 11% for transactions made through an alternative billing system. Read our [blog](#) for additional details.

If you are a developer with users in South Korea, you can learn more about implementing an additional in-app billing system in this [Help Center article](#).

## Why is the Payments Policy compliance deadline different for developers in India?

Last year, due to unique circumstances with the payments landscape in India, we extended the deadline for developers based in India to comply with Google Play's Payment Policy in India. This deadline has been further extended to October 31st, 2022 to provide developers in India the required product support for recurring payments through convenient user payment systems, including UPI and wallets, and to also provide them more time in light of the changes to India's recurring digital payments guidelines. We recognize the unique needs of the developer ecosystem in India and remain committed to partnering with them on their growth journey.

## I was approved for the extension for an additional 6 months to comply with Play's Payments policy. What happens if my app is still not compliant by the March 31, 2022 deadline?

We always strive to work with our developer community to help keep their apps on Play while they make any needed changes. In 2020, we clarified the language of our Payments policy to make it more clear that all apps must use Play's billing system for the purchase of in-app digital goods and services. While most developers already complied with this long-standing policy, we gave a one year grace period for any that needed to make changes to their apps. Based on developer feedback, in 2021 we gave developers the option to request an additional 6 months, giving them a total of 18 months to bring their apps into compliance.

All apps are required to comply with Play's Payments policy after March 31, 2022. We enforce our developer policies through different means including, but not limited to, app removals. If you were previously approved for an [extension](#) but your app is not compliant by the March 31, 2022 deadline, you will not be able to submit updates to that app until it is policy-compliant. If your app is non-compliant but you need to submit an update to fix a critical security issue, you can let us know by [filing an appeal](#) to the enforcement. We believe that this is the least disruptive option and allows developers to continue offering their apps while they make any final changes needed.

Starting on June 1, 2022, any apps that are still not compliant will be removed from Google Play.

Developers based in India have until October 31, 2022 to comply due to unique circumstances with the payments landscape in the country. Please [visit our FAQ](#) for more details.

Developers with users in South Korea have the option to integrate an alternative in-app billing system due to recent legislation. Please [visit our FAQ](#) for more details.

## Do direct tips or contributions from user to creator require Play's billing system?

In cases where 100% of the tip or contribution from a user goes to the creator and the payment does not grant access to any digital content or services (including stickers, badges, special emojis etc.), then we regard this as a peer-to-peer payment and use of Google Play's billing system is not required. If any of these things is not true, then Google Play's billing system must be used in accordance with the policy requirements.

### Related content

- Read our [Payments policy](#)
- Learn how to implement [Google Play's billing system](#)
- Learn more about our Payments policy on the [Academy for App Success](#)
- Read about [why we updated our Payments policy](#)

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